



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 29, 2024

BY CM/ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Keonne Rodriguez*, S2 24 Cr. 82 (RMB)

Dear Judge Berman:

Please find enclosed for the Court's consideration a proposed protective order in the above-referenced matter. Courts have routinely relied on Rule 16(d)(1) to limit discovery in situations where the disclosure of certain discovery beyond the defendant and his counsel could have harmful consequences. *See United States v. Aref*, 533 F.3d 72, 78 (2d Cir. 2008) (protective order for classified information); *United States v. Smith*, 985 F. Supp. 2d 506, 530-35 (S.D.N.Y. 2013) (protective order for information that might impede ongoing investigations); *United States v. Figueras*, 2009 WL 1364640, at *1-2 (W.D.N.Y. May 19, 2009) (protective order for identity of confidential informants); *United States v. Luchko*, 2007 WL 1651139, at *7 (E.D. Pa. June 6, 2007) (protective order entered because of, among other reasons, the personal privacy interests of third parties). In this case, the Government anticipates that the discovery materials will include, among other things: (1) evidence and law enforcement reports relating to an ongoing law enforcement investigation; and (2) materials that affect the privacy and confidentiality of the victims and/or witnesses, including personal identifying information and financial information. For this reason, the Government believes that the enclosed narrowly tailored Protective Order is appropriate. The enclosed Protective Order has already been executed by counsel for the defendant.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel for Defendant Keonne Rodriguez